

Dean Gazzo Roistacher LLP
Lee H. Roistacher, Esq. (SBN 179619)
440 Stevens Avenue, Suite 100
Solana Beach, CA 92075
Telephone: (858) 380-4683
Facsimile: (858) 492-0486
E-mail: lroistacher@deangazzo.com

Attorneys for Defendants
State of California by and through California
Highway Patrol and Officer Ramon Silva

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SANDRA KIRKMAN AND
CARLOS ALANIZ,
INDIVIDUALLY AND AS
SUCCESSORS-IN-INTEREST TO
JOHN ALANIZ, DECEASED,

Plaintiff,

v.

STATE OF CALIFORNIA;
RAMON SILVA; AND DOES 1-10,
INCLUSIVE,

Defendant.

Case No.: 2:23-cv-07532-DMG-SSC

**NOTICE OF MOTION AND
MOTION FOR SUMMARY
JUDGMENT BY DEFENDANTS
STATE OF CALIFORNIA BY AND
THROUGH CALIFORNIA
HIGHWAY PATROL AND
OFFICER RAMON SILVA;
MEMORANDUM OF POINTS
AND AUTHORITIES; SEPARATE
STATEMENT OF UNDISPUTED
MATERIAL FACTS AND
CONCLUSIONS OF LAW;
DECLARATION OF LEE H.
ROISTACHER; DECLARATION OF
DAVID BLAKE**

Date: February 28, 2025
Time: 2:00 p.m.
Courtroom: 8C
Judge: Hon. Dolly M. Gee

Complaint Filed: July 28, 2023
Trial Date: April 15, 2025

TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on February 28, 2025 at 2:00 p.m. or as soon thereafter as the matter may be heard in Courtroom 8C of the above-entitled court, located at 350 West 1st Street, Los Angeles, CA, 90012, defendants State of California by and through California Highway Patrol and Officer Ramon Silva

1 will move the Court under Federal Rule of Civil Procedure 56 for summary
2 judgment against plaintiffs.

3 This motion will be based on this notice and motion, the memorandum of
4 points and authorities, the separate statement of undisputed material facts and
5 conclusions of law, the declaration of Lee H. Roistacher and exhibits thereto, the
6 declaration of David Blake, and the pleadings and papers filed herein.

7 This motion is made following the conference of counsel pursuant to L.R.
8 7-3 which took place on January 2, 2025. *See* Doc 60.

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10 Dated: January 24, 2025

Dean Gazzo Roistacher LLP

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12 By: /s/ Lee H. Roistacher

13 Lee H. Roistacher
14 Attorneys for Defendants
15 State of California by and through
16 California Highway Patrol and
17 Officer Ramon Silva
18 Email: lroistacher@deangazzo.com
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